

EXHIBIT FORM

EXHIBIT (S) OF <u>PLAINTIFF J.K.J.</u> (Indicate plaintiff or defendant)	<u>J.K.J.</u> V. Case No. <u>15-CV-428</u> <u>Polk County and Darryl L. Christensen, et al.</u>			
EXHIBIT (S) OF <u>PLAINTIFF M.J.J.</u> (Indicate plaintiff or defendant)	<u>M.J.J.</u> V. Case No. <u>15-CV-433</u> <u>Polk County and Darryl L. Christensen, et al.</u>			
Date	Identification		Description	Offers, Objections, Rulings, Exceptions
No.	Witness			
1			Defendant Christensen's Personnel File (PCJ0000001-189)	Relevance, Motions in Limine (both object to other without Bates)
2			Defendant Christensen's Employment records (PCJ0000190-334)	Relevance, Motions in Limine (both object to other without Bates)
15			Inmate Screening Supplement (PCJ0003529)	Relevance
17			Complaints against Christensen (PCJ0003718-3736)	Relevance, Motions in Limine
18			1/18/12 Jorgenson's Fraternization with Inmate (PCJ0003737-3768)	Relevance
19			Training Plan 2005-2014 (PCJ0003769-3778)	Relevance
20			Training Sign in Sheets 2010-2014 (PCJ0003818)	Relevance

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	No.	Witness		
30			Photos-jail (4709-4723, 4726, 4729, 4731-4733, 4737, 4739, 4741, 4744, 4746, 4749, 4751, 4754, 4756, 4764, 4768, 4769, 4772-4774, 4778, 4780, 4781, 4788, 4789, 4808-4810)	Relevance
31			Handwritten letter from Inmate N.S. (PCJ0004936-4941)	Hearsay, Relevance
33			Allen Jorgenson Letter of Resignation to Nargis from Jorgenson-2/3/2012 (PCJ0004944)	Hearsay, Relevance
34			Additional late disclosed documents re: Jorgensen investigation (004674-4681MJJ/JKJ)	Hearsay, Relevance
47			Defendant Christensen's Certified plea hearing transcript (004573-4619 MJJ/JKJ)	Hearsay, Relevance
48			Defendant Christensen's Certified Sentencing transcript (004620-4672 MJJ/JKJ)	Hearsay, Relevance
49			Summary of Qualifications of Jeff Eiser	Hearsay
50			Curriculum Vitae Mark Raderstorf, M.A.	Hearsay, Relevance
82			Core Jail Standards, First Addition, Copyright 2010 by the American Correctional Association (portions of/not in its entirety) (limit to 1-CORE-4D-13 through 4D-16)	Relevance
84			Performance-Based Standards for Adult Local Detention Facilities, Fourth Addition, Copyright 2004 by the American Correctional Association (portions of/not in its entirety) (Limit to sec. 4-ALDF-4D-22)	Relevance
85			National Prison Rape Elimination Act, 42USC§15601, et sec. (portions of/not in its entirety)	Relevance
86			U.S. Department of Justice Prison Rape Elimination Act National Standards, 28CFR§115 (portions of/not in its entirety)	Relevance

Date	Identification		Description	Offers, Objections, Rulings, Exceptions
	No.	Witness		
102			Jerrick's Jorgensen Investigation Notes (PCJ0004945-4963)	Relevance, hearsay
103			Jerrick's Christensen Investigation Notes (PCJ0004964-4979)	Relevance, hearsay
104			Jail Photos taken on 1/19/2017 (MJJ/JKJ 5519-5537)	Relevance, hearsay
105			Jail videos taken on 1/19/2017 (2 total)	Relevance, hearsay
106			National Standards To Prevent, Detect, and Respond to Prison Rape, 77 Fed. Reg. 37106-01 (June 20, 2012) (limited to Vol. 77, No. 119, 37106-37232)	Relevancy